

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

JEFFERSON-PILOT LIFE INSURANCE CO.,) CASE NO. C-1-02-479
:	
Plaintiff,) JUDGE SPIEGEL
:	
vs.	: Magistrate Judge Hogan
:	
CHRISTOPHER L. KEARNEY,) <u>NOTICE OF DEPOSITIONS</u>
:	
Defendant.)

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 30, the defendant in the above matter will take the following depositions of plaintiff's employees and agents at the designated times and all at the offices of Graydon Head & Ritchey LLP, 1900 Fifth Third Center, 511 Walnut Street, Cincinnati, Ohio, 45202:

Robert Mills	Monday, May 24, 9:00 a.m.
William Hughes	Monday, May 24, 11:00 a.m.
Stefanie Farabow	Monday, May 24, 3:00 p.m.
William Dempsey	Tuesday, May 25, 8:30 a.m.
Geraldine Johnson	Tuesday, May 25, 11:00 a.m.

ALSO TAKE NOTICE that pursuant to Fed. R. Civ. P. 30(b)(6), the defendant in the above matter will take the deposition of Jefferson-Pilot Life Insurance Company ("J-P") on Tuesday, May 25, 2004, at 2:00 p.m. The deposition will be conducted at the offices of Graydon Head & Ritchey LLP, 1900 Fifth Third Center, 511 Walnut Street, Cincinnati, Ohio, 45202. The deposition will be conducted before a videographer and notary public or other officer duly authorized to administer oaths, and will cover the following topics:

1. The financial and other terms of J-P's relationship with Disability Management Services, Inc ("DMS"), including but not limited to DMS' administration of Chris Kearney's benefits claim;
2. The information, communications, and documentation (including electronic communications) shared between J-P and DMS;
3. DMS' administration of Mr. Kearney's claim;
4. DMS' disability claim administration process, including the policies and procedures applicable to that process; and

5. J-P's Complaint, affirmative defenses, answers to interrogatories, and production of documents in this action.

These depositions will be conducted before a videographer and a notary public or other officer duly authorized to administer oaths. The Deponent is further notified that the depositions shall continue from day to day until completed, and you may appear and take such part in the examination as you be advised and shall be fit and proper.

Dated: May 19, 2004

Respectfully submitted,

OF COUNSEL:

GRAYDON HEAD & RITCHEY LLP
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/s Michael A. Roberts
Michael A. Roberts (0047129)
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing instrument was filed electronically and thereby served this 19th day of May 2004 on William R. Ellis, Wood & Lamping, 600 Vine Street, Suite 2500, Cincinnati, Ohio 45202.

/s Michael A. Roberts